

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending Feb. 28, 2015

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Covington & Burling LLP

5852

(c) Business Address(es) of Registrant

850 Tenth Street, N.W.
Washington, D.C. 20001

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|---|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Branch offices | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

From time to time, partners not associated with the foreign principals join or leave the partnership.
In December 2014, the firm's Washington office moved to 850 Tenth Street, N.W.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☐If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

N/A: Waiver granted February 5, 2008.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
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From time to time, partners not associated with the foreign principals join or leave the partnership.

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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From time to time, partners not associated with the foreign principals join or leave the partnership.

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

Name	Residence Address	Citizenship	Position	Date Assumed
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See attachment.

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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Martin Gold	Senior Counsel	Nov. 30, 2014
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Gerald Masoudi	Partner	Corporación Colombia Internacional	Feb. 28, 2014
Daniel Spiegel	Senior Of Counsel	Corporación Colombia Internacional	Feb. 28, 2014

(See also question 7.)

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal

Date of Termination

Embassy of New Zealand

February 28, 2015

(Registrants: Berman, Hertling, Lai, McCartin, Smith, Wichterman)

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

Corporación Colombia Internacional

December 1, 2014

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

Government of Spain

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☒ No ☐

Exhibit B⁴ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

See attachment.

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See attachment.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
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See attachment.

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D⁸ to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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See attachment.

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See attachment.

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☐

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

Electronic Communications

- ☐ Email
☐ Website URL(s): _____
☐ Social media websites URL(s): _____
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)March 30, 2015/s/ Peter L. FlanaganeSigned

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Supplemental Statement
 Covington & Burling LLP
 September 1, 2014 – February 28, 2015
 Question 5(b)

Name	Residence Address	Citizenship	Position	Date
Miriam Guggenheim	511 Stonington Road Silver Spring, MD 20902	USA	Partner	12/1/14
Gerald Masoudi	7200 Elizabeth Drive McLean, VA 22101	USA	Partner	12/1/14
Muftiah McCartin	1441 N. Inglewood Street Arlington, VA 22205	USA	Of Counsel	12/1/14 (for CCI)
Jessica Parsons O'Connell	2315 Huidekoper Place NW Washington, DC 20007	USA	Sp. Counsel	12/1/14
Constance A. Pence	5235 Brawner Place Alexandria, VA 22304	USA	Sr. Int'l Advisor	12/1/14
Jeannie M. Perron	422 North Alfred St. Alexandria, VA 22314	USA	Partner	12/1/14
Daniel L. Spiegel	1121 Basil Road McLean, VA 22101	USA	Sr. Of Counsel	12/1/14
Maria Paula Uribe	305 Silver King Lane Rockville, MD 20850	USA	Advisor	12/1/14
Arturo A. Valenzuela	4426 Q St. NW Washington, DC 20007	USA	Sr. Advisor	12/1/14
Gina Vetere	1439 Cola Drive McLean, VA 22101	USA	Sp. Counsel	12/1/14

Supplemental Statement
Covington & Burling LLP
September 1, 2014 – February 28, 2015
Question 11

Embassy of New Zealand

Covington & Burling LLP will develop a legislative solution and strategy for facilitating greater trade and investment between the United States and New Zealand by improving temporary entry for New Zealanders into the United States. Covington & Burling LLP engages with relevant leaders in the U.S. Congress, Executive Branch, media, think tanks, and the business community to build support for the legislative proposal and corresponding justifications.

Government of Spain

Covington assists the Government of Spain with U.S. legislative and related policy matters potentially affecting the interests of Spain with respect to sunken vessels and their remains, including potential amendments to the Sunken Military Craft Act. As detailed in the registration filed on June 3, 2011, Covington also serves as counsel to Spain in litigation related to sunken vessels and their remains. During this period, Covington has not engaged in activities requiring registration under FARA for the Government of Spain.

Corporación Colombia Internacional

Covington & Burling LLP will review documentation provided by the foreign principal and the Colombian Ministry of Agriculture and consult with relevant United States government agencies to ascertain the current status of the U.S. Department of Agriculture's approval process for the export of Colombian crops to the United States, in light of the obligations the United States may have under the U.S.-Colombia Free Trade Agreement. The crops include hass avocados, peppers, watermelon, melon, mango and beef. Following this analysis, Covington & Burling LLP will propose specific steps that Covington would take, working with the foreign principal, to achieve the foreign principal's market access objectives.

Supplemental Statement
 Covington & Burling LLP
 September 1, 2014 – February 28, 2015
 Question 12

Embassy of New Zealand

Richard Hertling

Date	Name	Position	Type	Subject Matter
9/3/14	Branden Ritchie	Dep. Chief of Staff, House Committee on the Judiciary	E	Trade and investment visa proposal.
9/5/14	Branden Ritchie	Dep. Chief of Staff, House Committee on the Judiciary	E	Trade and investment visa proposal.

Muftiah McCartin

Date	Name	Position	Type	Subject Matter
9/26/14	Janice Kaguyutan	Chief Counsel, House Committee on Foreign Affairs	E	Trade and investment visa proposal.
9/30/14	Janice Kaguyutan	Chief Counsel, House Committee on Foreign Affairs	E	Trade and investment visa proposal.
10/14/14	Janice Kaguyutan	Chief Counsel, House Committee on Foreign Affairs	E	Trade and investment visa proposal.

Corporación Colombia Internacional

Arturo Valenzuela

Date	Name	Position	Type	Subject Matter
2/10/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	T	Agricultural exports from Colombia.
2/11/15	Sana Baig	Confidential Assistant, Deputy Under Secretary, Marketing and Regulatory Programs, USDA	T	Agricultural exports from Colombia.

M. Paula Uribe

Date	Name	Position	Type	Subject Matter
2/4/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	M	Agricultural exports from Colombia.
2/6/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	M	Agricultural exports from Colombia.
2/18/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	E	Agricultural exports from Colombia.

Key: E = E-mail, M = Meeting, T = Telephone Call

Supplemental Statement
 Covington & Burling LLP
 September 1, 2014 – February 28, 2015
 Question 14(a)

Embassy of New Zealand

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
9/17/14	Embassy of New Zealand	Retainer and reimbursed expenses	20,114.80
9/29/14	Embassy of New Zealand	Retainer and reimbursed expenses	20,039.50
11/17/14	Embassy of New Zealand	Retainer and reimbursed expenses	20,021.56
12/12/14	Embassy of New Zealand	Reimbursed expenses	305.00
	Total		<u>60,480.86</u>

Corporación Colombia Internacional

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
12/30/14	Corporación Colombia Internacional	Retainer	<u>25,000.00</u>
	Total		<u>25,000.00</u>

Government of Spain

Covington & Burling LLP received payments from the Government of Spain for legal and related services that would not require registration under the Foreign Agents Registration Act. Covington did not receive payments, in this period, for activities that would require registration under the Act.

Supplemental Statement
 Covington & Burling LLP
 September 1, 2014 – February 28, 2015
 Question 15(a)

Embassy of New Zealand

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
10/5/14	Employee reimbursement	FARA filing fee	305.00
Various	Various	Duplicating	5.40
Various	Various	Local transportation	16.16
		Total	<u>326.56</u>

Corporación Colombia Internacional

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
12/8/14	Employee reimbursement	FARA filing fee	305.00
Various	Various	Telecommunications	68.20
Various	Various	Local transportation	41.93
		Total	<u>415.13</u>

Government of Spain

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
10/5/14	Employee reimbursement	FARA filing fee	305.00
		Total	<u>305.00</u>

Covington & Burling LLP disbursed expenses for legal and related services for the Government of Spain that would not require registration under the Foreign Agents Registration Act, including expenses for legal research, travel, telecommunications, court filing fees, duplicating, printing, and postal and delivery services.

Supplemental Statement
 Covington & Burling LLP
 September 1, 2014 – February 28, 2015
 Question 15(c)

Covington & Burling LLP PAC

09/11/14	Valadao for Congress	\$1,000
09/15/14	Pat Roberts for U.S. Senate Inc.	\$1,000
09/17/14	DelBene for Congress	\$500
09/17/14	Friends of Dick Durbin	\$5,000
09/17/14	Gary Palmer for Congress	\$1,000
09/17/14	Nutmeg PAC	\$1,000
09/19/14	Defazio for Congress	\$1,000
09/19/14	Friends of Lois Capps	\$1,000
09/19/14	Louise Slaughter Re-Election Comm.	\$1,000
09/25/14	Crowley for Congress	\$1,000
10/17/14	Bill PAC	\$2,500
10/17/14	Dem. Cong. Campaign Committee	\$2,000
10/17/14	Hoyer's Majority Fund	\$2,500
10/17/14	Tom Reed for Congress	\$1,000
10/20/14	Gillibrand for Senate	\$2,500
10/24/14	Pat Roberts for U.S. Senate Inc.	\$2,500
11/11/14	Renee Ellmers for Congress Comm.	\$1,000
12/01/14	McHenry for Congress	\$1,000
12/01/14	Ron Johnson for Senate Inc.	\$1,000
12/01/14	Thom Tillis Committee	\$1,000
12/10/14	Rock City PAC	\$1,000
12/16/14	Comstock for Congress	\$2,500
01/05/15	Friends of Mazie Hirono	\$5,000
01/08/15	Martin Heinrich for Senate	\$1,000
01/08/15	Perlmutter for Congress	\$2,500
01/10/15	JIM PAC	\$1,500
02/03/15	Rob Portman for U.S. Senate	\$1,000
02/03/15	Friends of Jeb Hensarling	\$1,000
02/05/15	Ted Poe for Congress	\$1,000
02/11/15	Schatz for Senate	\$1,000
02/25/15	Bill PAC	\$5,000

Howard Berman

9/10/14	Chris Coons for Delaware	\$500
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Richard Hertling

9/5/14	Comstock for Congress	\$100
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Muftiah McCartin

9/18/14	Friends of Rosa DeLauro	\$250
10/31/14	Friends of Elizabeth Esty	\$250

Brian Smith

9/30/14	Shenna Bellows for Senate	\$250
11/3/14	Karl Racine for Attorney General	\$250

Daniel Spiegel

7/30/14	John Foust for Congress	\$500
9/1/14	Covington & Burling PAC	\$250
10/1/14	Covington & Burling PAC	\$250
10/28/14	John Foust for Congress	\$250
11/1/14	Covington & Burling PAC	\$250
12/1/14	Covington & Burling PAC	\$250
1/1/15	Covington & Burling PAC	\$250
2/1/15	Covington & Burling PAC	\$250

William Wichterman

9/28/14	Gillespie for Senate	\$500
10/2/14	Brownback for Governor	\$500